

### **REMARKS/ARGUMENTS**

The office action of April 6, 2007 has been carefully reviewed and these remarks are responsive thereto and are further to the Amendment filed June 21, 2007 for which entry is herein requested and assumed by the above amendments and the Advisory Action mailed July 6, 2007. Favorable consideration and allowance of the instant application are respectfully requested. Claims 1-53 remain in this application.

#### **Request For Interview**

Prior to further examination, applicants respectfully request a telephone interview with Examiner. In the event, an interview has not been scheduled by the time the Examiner has picked up the instant Amendment, applicants kindly request that the Examiner contact the undersigned at the number below.

#### **Section 101 Rejection**

Claims 1-53 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. As acknowledged in the Advisory Action, Applicants reply filed June 21, 2007 overcame this rejection.

#### **Prior Art Rejections**

Claims 1-6, 8-27 and 29-53 stand rejected under 35 U.S.C. § 103(a) as being obvious over Reutter “An Efficient Reuse System for Digital Circuit Design”, 1998 (hereinafter “Reutter”). Claims 7 and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Reutter in view of Hauck et al., “Data Security for Web-based CAD,” DAC 98, June 15-19, 1998, San Francisco, CA, pp. 788-793 (hereinafter “Hauck”). Applicants respectfully traverse these rejections.

Applicants incorporate by reference the remarks addressing the prior art rejections in the Amendment filed June 21, 2007. Applicants have amended each of the independent claims to clarify that “the simulation content file includes a structured collection of data sufficient to enable the simulation player to display the schematic diagram, and to execute the steps to run the

simulation system model.” Also, applicants have further amended the independent claims to clarify that the graphical user interface and simulation execution components of the simulation player are adapted to prohibit *their use by the end-user for the purpose of* modifying the simulation model.” In the previous Amendment, filed on June 21, 2007 applicants submitted that Sections 3 and 4.1 of Reutter were directed to issues of database access and database management to facilitate reuse of IP blocks, and not to any functionality implemented within a simulation software application. The Advisory Action acknowledges that Reutter discloses that “checked data” may not be altered, but maintained that “this does not indicate that downloaded data can be altered, only that verifications can be performed.” In response to this contention, applicants note that Reutter is totally silent as to whether the downloaded data can be altered. Applicants however maintain that one skilled in the art would infer that the end-user *must* be able to access and modify downloaded information, since the whole purpose of the system disclosed in Reutter is to facilitate the *reuse* of IP blocks. Furthermore, in the absence of special protection measures, information that has been downloaded from a database, or other server, can normally be manipulated and/modified by a user of the local computer, even if the user is subsequently restricted in their ability to upload modified data back to the server.

The aforementioned amendments to the independent claims are intended to clarify the differences between the claims and Reutter. Namely, independent claims 1, 22, 32, 43, 49 and 53 each call for the graphical user interface means and/or the means for running the simulation system model to be adapted to prohibit their use by the end-user for the purpose of modifying the simulation model by adding or removing any of the component models, subsystem models or interconnections of the simulation system model. Similarly, independent claims 16 and 47 call for enabling an end-user to run the simulation system model via the graphical user interface while prohibiting its use by the end-user for the purpose of modifying the simulation system model by adding or removing any of the component models, subsystem models or interconnections of the simulation system model. Applicants submit that Reutter does not disclose, teach or suggest the aforementioned features of the independent claims.

As such, applicants submit that the amended independent claims are patentably distinct from the applied art. More particularly, no disclosure, teaching or suggestion exists in Reutter or

any other prior art reference of record, or in any combination thereof, of a computer-implemented simulation player, as recited in claims 1, 22, 32, 43, 49 and 53, including:

- means for reading a simulation content file that includes information describing a simulation system model;
- graphical user interface means for displaying to an end-user a schematic diagram of the simulation system model; and
- means for running the simulation system model using the information in the simulation content file,
- wherein the simulation content file includes a structured collection of data sufficient to enable the simulation player to display the schematic diagram, and to execute the steps to run the simulation system model, and
- wherein the graphical user interface means and/or the means for running the simulation system model are adapted to prohibit their use by the end-user for the purpose of modifying the simulation model by adding or removing component models, subsystem models or interconnections.

Each of claims 2-6, 8-15, 17-21, 23-27, 29-31, 33-42, 44-46, 48 and 50-52 ultimately depends from one of the aforementioned independent claims, and is considered patentably distinct from Reutter for the same reasons as their ultimate base claim, and further in view of the novel and non-obvious features recited therein.

Claims 7 and 28 stand rejected over Reutter in view of Hauck. Claim 7 depends on claim 1 and claim 28 depends on claim 22. Hauck however fails to overcome the deficiencies of Reutter identified with respect to claims 1 and 28. As such, notwithstanding the propriety of combining Reutter and Hauck, the combination does not result in the inventions of claims 22 and 28. For at least this reason, claims 22 and 28 are patentably distinct from the combination of Reutter and Hauck.

### **CONCLUSION**

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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